



SITE: Holly Street Hg Spill
BREAK: 2.9
OTHER: _____

**U.S. ENVIRONMENTAL PROTECTION AGENCY
EMERGENCY ACTION MEMORANDUM**

Date: June 16, 2008
Subject: Holly Street Hg Spill
Pooler, Chatham County, Georgia
From: Leslie Sims, OSC, Region 4
To: Regional Response Center, 4WD-ERRB
Matt Taylor, ERRB

I. PURPOSE

The purpose of this Emergency Action Memorandum is to document the decision to initiate emergency response actions described herein for the Holly Street Mercury Spill Site, which is located at 612 Holly Street, Pooler, Chatham County, Georgia. This action is initiated under the On-Scene Coordinator's \$250,000 Warrant Authority.

II. BACKGROUND

Site No: A4TN
Contractor: ER Services
CERCLIS No: GAN000410221
Response Authority: CERCLA
State Notification: June 16, 2008
Demobilization Date: N/A

Site Ceiling: \$50,000
DO No.: 0704-F4-0015
ERNS No:
NPL Status: Non-NPL
Start Date: June 16, 2008
Completion Date: N/A

III. SITE INFORMATION

- A. Incident Category:** (check one)
- ☐ Active Production Facility
 - ☐ Inactive Production Facility
 - ☐ Active Waste Management Facility
 - ☐ Inactive Waste Management Facility
 - ☐ Midnight Dump
 - ☐ Transportation Related
 - ☒ Other (specify): Improper handling of hazardous substance



10597044

B. Site Location

1. Site description

a. Removal site evaluation

The National Response Center (NRC) was notified on June 11, 2008 by the Georgia Department of Environmental Protection informing them of a mercury spill at the Pooler Elementary School located at 308 Holly Ave, Pooler, Chatham County, Georgia. A student brought a small container that held mercury to school and opened the container and spilled an undetermined amount inside the building. It was reported that a child, residing at 612 Holly Street, was at the school following the spill and tracked an unknown amount of the substance home. As a result, several areas of the home became contaminated with elemental mercury, including the child's bedroom.

b. Physical location and Site characteristics

The Site consists of mercury contamination inside the home located at 612 Holly Street and contaminated clothing of the child and parents residing at this location.

c. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Mercury is a hazardous substance as defined by CERCLA. If actions are not taken to properly collect, contain and dispose of the mercury, the potential exists for the material to be released into the environment.

d. Maps, pictures, and other graphic representations

Maps, pictures, and other graphic representations can be made available upon request.

2. Description of threat

Explanations of how this release or threat of release meets the criteria for threats to public health or welfare or the environment in section 300.415 (b)(2) of the NCP are discussed below.

XX a. 300.415(b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants: Air monitoring indicated elevated levels of mercury vapors above the EPA Region 4 removal action levels for a residential setting. Any person could potentially come in contact with the elemental mercury or inhale unhealthy levels of mercury vapors.

XX g. 300.415(b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release.": Georgia Division

of Environmental Protection nor the homeowner has sufficient resources to manage the emergency response action and cleanup activities.

- XX h. 300.415(b)(2)(viii) "Other situations or factors that may pose threats to public health or welfare of the United States or the environment.": If actions are not taken to abate the threats posed by the mercury, the potential exists for the mercury to be spread to additional private residences.

C. Preliminary Assessment/Site Inspection Results:

All Preliminary Assessment/Site Inspections were performed at this Site by EPA and its contractors.

IV. RESPONSE INFORMATION

A. Situation

1. **Current situation:** EPA and contractors initiated mercury containment and cleanup activities.

2. **Removal activities to date**

- a. Federal Government/Private Party

OSC Leslie Sims with the Region 4 Emergency Response and Removal Branch (ERRB), initiated the emergency response action at the site. START contractors mobilized to assist with air monitoring, air sampling, data management, and site documentation. EPA tasked Environmental Restoration Services (ER) to assist with the mercury assessment and cleanup activities, and to arrange for the ultimate transportation and disposal of any mercury contaminated items.

Actual removal activities at the home included decontamination of hard surfaces, removal of contaminated appliances and removal and replacement of 100 square feet section of carpet (located in the child's room). The home was heated to volatilize as much of the mercury vapors as possible. A venting system was set up to keep the air flow moving away from the contaminated areas.

- b. State/Local

The State and County was made aware of EPA's removal action.

3. **Enforcement¹**

An EPA attorney has been assigned to pursue possible enforcement options.

B. **Planned Removal Actions**

1. **Proposed action description**

The specific tasks involved in the proposed response to the threats include (check applicable):

XX Cleanup, Mitigation and Disposal: EPA and its contractors will perform appropriate mercury mitigation activities where mercury vapor levels have been identified to exceed EPA Region 4 removal action levels.

XX Analytical: Confirmation air samples will be collected following cleanup of structures identified to have mercury contamination.

Any off-site disposal will be in compliance with the CERCLA off-site disposal policy.

2. **Contribution to remedial performance**

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

3. **Description of Alternative Technologies**

N/A

4. **ARARs**

The Federal ARARs identified for the site include:

XX RCRA Treatment, Storage and Disposal
XX RCRA Transportation
XX DOT
XX OSHA

5. **Project schedule**

The on-site removal action is expected to be completed within the week. The final transportation and disposal of the mercury contaminated materials will be completed within the next month.

¹ Enforcement strategy is not part of the Action Memo for purposes of NCP consistency.

C. Next Steps

Disposal profile sampling of the contaminated carpet and debris and transportation and disposal to a CERCLA approved facility.

V. COSTS

Extramural Costs:

	<u>Ceiling</u>
ER	\$ 30,000
Tetra Tech- START	\$ 5,000
Contingency	\$ 10,000
Estimated EPA Direct Costs ² :	<u>\$ 5,000</u>
Total Project Ceiling/Site Cost	\$ 50,000

The Project Ceiling has been approved by the OSC as documented in this Action Memo. The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor. Other financial data, which the OSC must rely upon, may not be entirely up to date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

Disposal analysis will be conducted on waste as appropriate in order to identify potential disposal options.

VII. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, welfare, or the environment.

VIII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would increase the actual or potential threats to the public and the environment.

IX. OUTSTANDING POLICY ISSUES


The following remaining policy issues are associated with the site: NONE

² Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

X. APPROVAL

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the site.

Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and through this document. I am approving the proposed removal actions. The total project ceiling is **\$50,000**, of which an estimated \$40,000 will be funded from the Regional removal allowance.



Leslie Sims, OSC

6/17/08

Date